



Hoffman Employment Law, LLC

600 Jefferson Plaza Suite 204
Rockville, MD 20852
Phone: 301-251-3752 | Fax: 301-251-3753

Account Statement

Prepared for Kristin Hoey
Re: Office Bar & Grill

Previous Balance	\$0.00
Current Charges	\$17,821.99
New Balance	\$17,821.99
Adjustments	\$0.00
Payments	\$0.00
Now Due	\$17,821.99
Trust Account	\$0.00

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PRE-BILL

Kristin Hoey

Invoice Date: October 03, 2019
 Invoice Number: Pre-bill
 Invoice Amount: \$17,821.99

Matter: Office Bar & Grill

Attorney's Fees

10/18/2017	Tele conf. with Hoey re status of matter. (.2 hrs).	H.B.H.	.50	\$200.00
	Draft lengthy comm. to Wrobel re litigation claims and options. (.3 hrs).			
10/19/2017	Review comm. from Wrobel re status of matter.	H.B.H.	.10	\$40.00
12/15/2017	Lengthy tele conf. with K. Hoey re claims. (.8 hrs).	H.B.H.	1.30	\$520.00
	Draft lengthy comm. to S. Wrobel re same. (.5 hrs).			
1/6/2018	Review comm. from SW re K. Hoey. Forward to client.	H.B.H.	.10	\$40.00
1/16/2018	Draft comm. to S. Wrobel re employer response to demand by K. Hoey.	H.B.H.	.20	\$80.00
1/30/2018	Draft comm. to S. Wrobel re status of matter.	H.B.H.	.10	\$40.00
5/2/2018	Tele conf with client re status of matter.	H.B.H.	.30	\$120.00
5/2/2018	Review file materials and draft Collective Action Complaint. (2.7 hrs). Prepare Summons and Civil Coversheet. (.3 hrs). Draft opt-in notice; transmit to client. (.3 hrs). Open case via ECF. (.2 hrs).	H.B.H.	3.50	\$1,400.00
5/24/2018	File Proof of Service re Summons for three defendants.	H.B.H.	.10	\$40.00
5/26/2018	Draft comm. to client re status of matter.	H.B.H.	.10	\$40.00
6/13/2018	Review Court docket and response due dates; conf with JL re status of matter and failure to respond. Discuss strategies and law regarding cond cert and default. Discuss assignment and division of labor re anticipated Motion for Conditional Cert.	H.B.H.	.30	\$120.00
6/13/2018	Reviewed court docket and responses due. Conf. w/ HBH re status of matter and failure to respond. Discussed strategy re conditional certification,	J.L.	.30	\$61.50

	discussed motion that needs to be drafted.			
6/16/2018	Draft Motion for Conditional Certification. Perform legal research in support. Review file materials.	H.B.H.	3.80	\$1,520.00
6/16/2018	Review and respond to comm. with client re status of matter.	H.B.H.	.20	\$80.00
6/17/2018	Review and edited motion for conditional certification	J.L.	1.30	\$266.50
6/18/2018	Tele conf. with K. Hoey re status of matter; interview re Motion for Cond. Cert.	H.B.H.	.60	\$240.00
6/18/2018	Conf with JL re division of labor re Motion for Cond Cert.	H.B.H.	.10	\$40.00
6/19/2018	Edited and revised motion for conditional certification and request for court to take judicial notice.	J.L.	3.80	\$779.00
6/23/2018	Review and revise Motion for Conditional Certification. Draft proposed Class Notice. Revise opt-in notice.	H.B.H.	2.20	\$880.00
6/25/2018	Review HBH revisions to mot. for cond. cert.	J.L.	.60	\$123.00
6/28/2018	Draft entry of appearance	J.L.	.20	\$41.00
6/28/2018	Editing entry of appearance	J.L.	.10	\$20.50
6/28/2018	Finalizing and filing notice of appearance. Training w/HBH on mailing notice of appearance to def.	J.L.	.40	\$82.00
7/6/2018	Discuss w/ HBH re case status and strat	J.L.	.10	\$20.50
8/3/2018	Review Order of Court re Conditional Certification. Transmit same to former counsel.	H.B.H.	.30	\$120.00
8/7/2018	Review case status w/ HBH and GH	J.L.	.10	\$20.50
8/10/2018	Draft comm. to process server re service of Court Order on Defendants. Review response.	H.B.H.	.10	\$40.00
8/17/2018	Draft comm. to process server re status of matter. Review response and reply.	H.B.H.	.20	\$80.00
8/20/2018	Review and edit motion for order directing show cause.	J.L.	.30	\$61.50
10/2/2018	Review email correspondence with client Krisiten Hoey regarding case update.	G.H.	.10	\$20.50
10/2/2018	Review email to Pl. re case status update.	J.L.	.10	\$20.50
10/2/2018	Draft comm. to K. Hoey re status of matter.	H.B.H.	.30	\$120.00
10/11/2018	Conf. with HBH and JSL regarding case status and assignments.	G.H.	.10	\$20.50
10/11/2018	Discuss case status w/ HBH and GBH.	J.L.	.10	\$20.50
11/14/2018	Review clerk's entry of default.	J.L.	.10	\$20.50
11/14/2018	Review Clerk's Entry of Default.	H.B.H.	.10	\$40.00
11/15/2018	Draft case status update email to Pl.	J.L.	.20	\$41.00
11/16/2018	Review email corresp. from Pl. and HBH re entry of default.	J.L.	.10	\$20.50
11/16/2018	Review comm between JL and client; draft comm to client re possibility for vacating default.	H.B.H.	.20	\$80.00
1/10/2019	Review and respond to comm from S. James re scheduling of teleconference with Judge Blake re pending Request Show Cause re Contempt. Confer with J. Liew re same.	H.B.H.	.20	\$80.00
1/17/2019	Tele conf with Court re pending Show Cause	H.B.H.	.70	\$280.00

	request. (.2 hrs). Confer with J. Liew re strategies for moving matter forward; discuss Office Bar & Grill prior litigation; discuss potential options short of imprisonment for contempt. (.5 hrs).			
1/17/2019	Confer call w/ judge re mot. show cause (0.2); Confer w/ HBH re case strat for reducing sanction penalty from imprisonment, discussion of prior Def. litigation.	J.L.	.70	\$143.50
1/17/2019	Conduct research on contempt of Court order to produce list of employees and contact information for conditional cert. (5.3); Conduct research on defaults and default judgments in class and collective action context (1.2).	J.L.	6.50	\$1,332.50
1/17/2019	Edit proposed show cause order to reduce severity of sanctions suggested.	J.L.	.70	\$143.50
1/18/2019	Review and revise proposed Show Cause Order. (.2 hrs). Draft comm. to Judicial Assistant for Judge Blake. (.1 hrs).	H.B.H.	.30	\$120.00
1/18/2019	Review and respond to comm from client re status of matter.	H.B.H.	.10	\$40.00
1/31/2019	Review Show Cause Order.	H.B.H.	.10	\$40.00
2/15/2019	Draft Plaintiff's Status Report regarding service of Court Order, and prepare exhibits for filing.	G.H.	.40	\$82.00
3/21/2019	Review case file, review and revise status report regarding service of show cause order on defendants.	G.H.	.20	\$41.00
3/26/2019	Phone confers w/ HBH and opposing counsel re show cause hearing, appearance of defendants in case, terms of opt-in notifications (0.2); phone call w/ Court, HBH and opposing counsel re. show cause hearing (0.1).	J.L.	.30	\$61.50
3/26/2019	Review, prepare and file status report letter to court to cancel show cause hearing.	J.L.	.20	\$41.00
3/28/2019	Draft revised order regarding class notification and joint motion.	G.H.	1.80	\$369.00
4/3/2019	Tele conf with K. Hoey re status of matter.	H.B.H.	.30	\$120.00
4/3/2019	Review and revise Joint Motion. Review and revise proposed Order. (1.3 hrs). Multi comm with M. Neary re same.	H.B.H.	1.60	\$640.00
4/3/2019	Review motion re set aside entry of default.	H.B.H.	.10	\$40.00
4/5/2019	Draft comm to M. Neary re status of Joint Motion; review response.	H.B.H.	.10	\$40.00
4/8/2019	Review order vacating entry of default.	J.L.	.10	\$20.50
4/8/2019	Prepare and file motion requesting entry of amended conditional certification order and accompanying exhibits.	J.L.	.40	\$82.00
4/9/2019	Review order amending cond. cert. order and signing class notice.	J.L.	.10	\$20.50
4/9/2019	Review court order, prepare class notices and opt-in forms for mailing, mail notices to class members (2.3);	G.H.	2.70	\$553.50

Pursuant to Court's order, sent automated text messages to class members regarding opt-in period and correspond with class members regarding the lawsuit (.4).

4/18/2019	Review Answer and corporate disclosure.	J.L.	.20	\$41.00
4/18/2019	Briefly review Answer and Local Rule Disclosure.	H.B.H.	.10	\$40.00
4/23/2019	Drafting Motion to Deem Admitted	S.K.	2.10	\$430.50
4/24/2019	Conference w/ HBH and SEK on case status and assignment of duties.	J.L.	.10	\$20.50
4/24/2019	Review Case Status	S.K.	.10	\$20.50
4/25/2019	Review Order re scheduling conference.	H.B.H.	.10	\$40.00
5/15/2019	Review def. certification of poster posting.	J.L.	.10	\$20.50
5/21/2019	Call w/ opposing counsel, HBH, SEK and judge re proposed scheduling order.	J.L.	.20	\$41.00
5/21/2019	Confer w/ HBH and SEK re case status and discovery strategy.	J.L.	.20	\$41.00
5/21/2019	call w/ opposing counsel and judge re proposed scheduling order.	S.K.	.20	\$41.00
5/21/2019	conference w/ HBH and SEK re case status and discovery strategy.	S.K.	.20	\$41.00
5/22/2019	Review and calendar scheduling order.	J.L.	.20	\$41.00
5/22/2019	Review Comms re: Stipulation	S.K.	.10	\$20.50
5/22/2019	Review File re: Discovery	S.K.	.60	\$123.00
5/24/2019	Review email from opposing counsel re. enterprise coverage.	J.L.	.10	\$20.50
5/24/2019	Review comm from M. Neary re stipulation of coverage.	H.B.H.	.10	\$40.00
5/29/2019	Entering Notice of Appearance	S.K.	.20	\$41.00
5/31/2019	Drafting Interrogs.	S.K.	2.20	\$451.00
5/31/2019	Drafting RPDs	S.K.	2.10	\$430.50
6/17/2019	Review email communications between HBH and opposing counsel re. scheduling phone conference re. stipulation.	J.L.	.10	\$20.50
6/26/2019	Review email from HBH to opposing counsel re. settlement offer.	J.L.	.10	\$20.50
6/26/2019	Draft comm to M. Neary re status of matter.	H.B.H.	.10	\$40.00
7/8/2019	Review Expert Report	S.K.	.50	\$102.50
7/8/2019	Review expert report.	J.L.	.10	\$20.50
7/8/2019	Review email from HBH to opposing counsel re. expert report and pace of case.	J.L.	.10	\$20.50
7/8/2019	Draft lodestar statement	S.K.	.20	\$41.00
7/18/2019	Review settlement offer and documents from counsel	S.K.	.40	\$82.00
7/18/2019	Review comm from defense counsel re settlement offer. Multi tele conf with client re same.	H.B.H.	.30	\$120.00
7/23/2019	Review emails from expert re. damage calculations.	J.L.	.10	\$20.50
7/23/2019	Review email from HBH to opposing counsel re. settlement and attorneys' fees.	J.L.	.10	\$20.50
7/23/2019	Tele conf with K. Hoey re settlement offer. (.2 hrs). Review fee and cost records; draft lengthy comm to opposing counsel re same.	H.B.H.	.50	\$200.00

7/24/2019	Review email from opposing counsel re. attorneys' fees and costs.	J.L.	.10	\$20.50
7/24/2019	Review email from counsel re: discovery	S.K.	.10	\$20.50
7/24/2019	Review comm from opposing counsel re settlement status.	H.B.H.	.10	\$40.00
8/5/2019	Review email from HBH to opposing counsel re. response for settlement offer.	J.L.	.10	\$20.50
8/14/2019	Review email from HBH to opposing counsel re. pace of settlement negotiations and need for discovery.	J.L.	.10	\$20.50
8/14/2019	Review email from opposing counsel re. settlement timing and discovery deadline.	J.L.	.10	\$20.50
8/14/2019	Draft comm to opposing counsel re status of matter.	H.B.H.	.10	\$40.00
8/14/2019	Review email from counsel re: discovery responses	S.K.	.10	\$20.50
8/19/2019	Draft comm to M. Neary re status; review response.	H.B.H.	.10	\$40.00
8/20/2019	Phone confer w/ HBH, SEK and opposing counsel re. possibility of settlement and need to move case forward.	J.L.	.20	\$41.00
8/20/2019	Call w/ opposing counsel re: settlement offer and extension of discovery.	S.K.	.20	\$41.00
8/22/2019	Review email from opposing counsel agreeing to settlement terms and attorneys' fees and costs.	J.L.	.10	\$20.50
8/22/2019	Review email from counsel re: settlement offer	S.K.	.20	\$41.00
8/23/2019	Review comms from Neary. Forward to client with comm; review response.	H.B.H.	.20	\$80.00
8/26/2019	Review email from HBH to Pl. Hoey re. settlement offer from Defendants.	J.L.	.10	\$20.50
8/26/2019	Confer w/ HBH re. settlement terms offered by Defendant and proposed response.	J.L.	.10	\$20.50
8/26/2019	Confer w/ J. Liew re. settlement negotiations and proposed response.	H.B.H.	.10	\$40.00
9/3/2019	Review emails between HBH and opposing counsel re. timing of settlement payments.	J.L.	.10	\$20.50
9/3/2019	Phone call w/ Pl. Holt re. settlement checks delivery, Docusign tax forms to him for completion.	J.L.	.10	\$20.50
9/3/2019	Draft/send text to Plaintiff Hoey re: contact office to discuss case.	S.K.	.10	\$20.50
9/3/2019	Review email from Neary and HBH response re: schedule of settlement payments.	S.K.	.20	\$41.00
9/3/2019	Draft comm to Neary re status of settlement offer.	H.B.H.	.10	\$40.00
9/4/2019	Review email communications from SEK re. position of Defendants re. settlement payment timeline.	J.L.	.10	\$20.50
9/4/2019	Call w/ Neary re: settlement payments.	S.K.	.20	\$41.00
9/4/2019	Draft email to HBH re: summary of call with Neary.	S.K.	.10	\$20.50
9/5/2019	Call w/ Mike Neary re: response to email regarding payment of settlement in installments.	S.K.	.10	\$20.50
9/5/2019	Review settlement negotiations and status of settlement.	S.K.	.30	\$61.50
9/9/2019	Draft Settlement Agreement.	S.K.	1.50	\$307.50
9/13/2019	Review revisions to settlement agreement; comm	H.B.H.	.20	\$80.00

	with opposing counsel re same.			
9/16/2019	Review emails between HBH and opposing counsel re. edits to settlement agreement, review redline edits.	J.L.	.10	\$20.50
9/17/2019	Review email from Neary re: status of Settlement signatures	S.K.	.10	\$20.50
9/19/2019	Review Order reassigning case to Gallagher	S.K.	.10	\$20.50
9/20/2019	Review emails between HBH and opposing counsel re. signatures for settlement agreement.	J.L.	.10	\$20.50
9/20/2019	Review partially signed settlement agreement, text Pl. Hoey for signing of settlement agreement, transmit same.	J.L.	.10	\$20.50
9/20/2019	Review signed settlement agreement.	S.K.	.20	\$41.00
10/1/2019	Draft motion for approval of settlement agreement.	J.L.	2.20	\$451.00
10/2/2019	Draft joint motion for approval of settlement agreement.	J.L.	1.70	\$348.50
10/2/2019	Review joint motion for approval of settlement agreement w/ HBH (0.2); edit and revise motion, send to opposing counsel for review (0.2).	J.L.	.40	\$82.00
10/2/2019	Draft proposed order for joint motion for approval of settlement agreement.	J.L.	.20	\$41.00
SUBTOTAL:			62.50	\$16,771.00

Costs

5/2/2018	Filing Fee	\$400.00
5/15/2018	Postage - Superior Process Service	\$3.31
5/24/2018	Service of Process - Superior Process, LLC	\$150.00
2/18/2019	Service of Process - Superior Process, LLC	\$150.00
4/9/2019	Postage for Class Notice mailing.	\$16.25
9/27/2019	Expert Witness Calcs and Report - E. Schulman, CPA/CFE	\$290.50
10/3/2019	Total postage.	\$40.93
SUBTOTAL:		\$1,050.99

Matter Ledgers

SUBTOTAL:

Trust Account

10/3/2019	Previous Balance	\$0.00
Available in Trust:		\$0.00

TOTAL \$17,821.99
PREVIOUS BALANCE DUE \$0.00

CURRENT BALANCE DUE AND OWING \$17,821.99